

29 JAN 1985

For Six Month Period Ending _____

(Insert date)

Name of Registrant

Registration No.

DEVELOPMENT COUNSELLORS INTERNATIONAL LTD.

1421

Business Address of Registrant

733 Third Avenue, New York, NY 10017

I-REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

(1) Residence address	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

INTERNAL SECURITY
SECTION
REGISTRATION UNIT
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RECEIVED
U.S. DEPARTMENT
OF JUSTICE
CRIMINAL DIVISION

2. Explain fully all changes, if any, indicated in item 1.

Not applicable.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name

Position

Date Connection
Ended

Not applicable.

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?
 Yes ☐ No ☒

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
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5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal?
 Yes ☐ No ☒

If yes, identify each such person and describe his services.

Not applicable

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or connection	Date terminated
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Not applicable.

7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

If yes, furnish the following information:

Name	Residence Address	Position or connection	Date connection began
Glenrothes Development Corp.:		Publicized & informed U. S. businessmen about opportunities in Scotland via press releases and mailings and ads.	
Netherlands Antilles:		Publicized and informed U. S. businessmen about opportunities in NA via ads and press releases.	
Newfoundland:		Publicized and informed U. S. businessmen about opportunities in Newfoundland via press releases.	
Australian Tourist Commission:		Promoted travel to Australia via press releases & feature stories in trade & consumer magazines; coordinated group & individual press tours to Australia; placed Australian spokespeople on appropriate radio & TV programs, and other associated public communications/publicity activities.	

II--FOREIGN PRINCIPAL

(PAGE 3)

8. Has your connection with any foreign principal ended during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

Name of foreign principal

Date of Termination

Netherlands Antilles Economic Mission

9/30/84

9. Have you acquired any new foreign principal¹ during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish following information:

Name and address of foreign principal

LUXEMBOURG BOARD OF ECONOMIC DEVELOPMENT

801 Second Ave., New York, NY 10017 (Acquired 12/21/84)
Date acquired

AUSTRALIAN TOURIST COMMISSION

HELLENIC DEVELOPMENT CORP.

3550 Wilshire Blvd., #1740

610 Fifth Ave., Suite 308

Los Angeles, Cal. 90010

New York, NY 10020

(Acquired - 1/1/85)

(Acquired 9/15/84)

10. In addition to those named in Items 8 and 9, if any, list the foreign principals¹ whom you continued to represent during the 6 month reporting period.

Glenrothes Development Corporation

Newfoundland Dept. of Industrial Development

Netherlands ~~XXXXXXXX~~ Antilles Economic Mission

III--ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

Glenrothes Development Corp.: Publicized & informed U. S. businessmen about opportunities in Scotland via press releases and mailings and ads.

Netherlands Antilles: Publicized and informed U. S. businessmen about opportunities in NA via ads and press releases.

Newfoundland: Publicized and informed U. S. businessmen about opportunities in Newfoundland via press releases.

Australian Tourist Commission: Promoted travel to Australia via press releases & feature stories in trade & consumer magazines; coordinated group & individual press tours to Australia; placed Australian spokespeople on appropriate radio & TV programs, and other associated public communications/publicity activities.

Luxembourg: Developed new advertisements for BOARD OF ECONOMIC DEVELOPMENT, furnished mechanicals & repro negatives; provided media schedule.

Hellenic Development Corp.: Publicized & informed U.S. businessmen about opportunities in Greece via press releases, mailings, articles in business magazines, appearances on radio & TV programs.

¹The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity² as defined below?
Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

Activities engaged in have been detailed in answer to Question 11 of this report.

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals? Yes ☐ No ☒

If yes, describe fully.

Not applicable.

²The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV—FINANCIAL INFORMATION

14. (a) RECEIPTS—MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.³

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
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See attached listing of receipt.

Total

(b) RECEIPTS—THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁴ other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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Not applicable

³A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

⁴Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS--MONIES

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes ☒ No ☐

(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

<i>Date</i>	<i>To Whom</i>	<i>Purpose</i>	<i>Amount</i>
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See attached list of cash disbursements on behalf of foreign principals.

Total

15. (b) DISBURSEMENTS—THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value⁵ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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Not applicable.

(c) DISBURSEMENTS—POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value⁵ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
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Not applicable.

V—POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☒ No ☐

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

Newfoundland Dept. of Development
Hellenic Development Corp.

⁵Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda? Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

Not applicable

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:

☒ Radio or TV broadcasts ☒ Magazine or newspaper articles ☐ Motion picture films ☒ Letters or telegrams
☐ Advertising campaigns ☒ Press releases ☒ Pamphlets or other publications ☒ Lectures or speeches

☐ Other (specify) _____

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:

☐ Public Officials ☒ Newspapers ☐ Libraries
☐ Legislators ☒ Editors ☐ Educational institutions
☐ Government agencies ☒ Civic groups or associations ☐ Nationality groups
☐ Other (specify) _____

21. What language was used in this political propaganda:

☒ English ☐ Other (specify) _____

22. Did you file with the Registration Section, U.S. Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period? Yes ☒ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☒ No ☐

24. Did you file with the Registration Section, U.S. Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act? Yes ☒ No ☐

VI—EXHIBITS AND ATTACHMENTS

25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A⁶ Yes ☒ No ☐
Exhibit B⁷ Yes ☒ No ☐

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☒ No ☐

If yes, have you filed an amendment to these exhibits? Yes ☒ No ☐

If no, please attach the required amendment.

⁶The Exhibit A, which is filed on Form CRM-157 (Formerly OBD-67) sets forth the information required to be disclosed concerning each foreign principal.

⁷The Exhibit B, which is filed on Form CRM-155 (Formerly OBD-65) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

26. EXHIBIT C

If you have previously filed an Exhibit C⁸, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☒

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

Not applicable.

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements been filed by all of the persons named in Items 5 and 7 of the supplemental statement? Yes ☒ No ☐

If no, list names of persons who have not filed the required statement.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration state. and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) personal knowledge.

We declare under penalty of perjury that the foregoing is

true and correct.

Executed on February 19, 1985.

(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

T. M. Levine

Ted M. Levine - President

Emanuel T. Ellenis

Emanuel T. Ellenis - Exec. Vice-Pres.

Subscribed and sworn to before me at _____

this _____ day of _____, 19 _____

(Signature of notary or other officer)

⁸The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, U.S. Department of Justice, Washington, D.C. 20530.)

DEVELOPMENT COUNSELLORS INT'L. LTD.
SUITE 2100, 733 THIRD AVENUE
NEW YORK, N. Y. 10017

DEVELOPMENT COUNSELLORS INTERNATIONAL, LTD.

SUPPLEMENTAL STATEMENT - Period End. 1/29/85

AUSTRALIAN TOURIST COMMISSION

Cash Disbursements:	Name	Amount	Type
12/17	Ted M. Levine	415.65	Entertain.
12/20	Copeland Cutler Trav	607.50	Tickets
1/21/85	T. M. Levine	14.20	Entertain.
1/22	Amer. Express	337.75	Travel
	Economy Messenger	13.00	Messenger
1/24	P. T. Levine	6.00	Travel
1/28	T. M. Levine	76.90	Entertain.

Total 1,055.35

GLENROTHES

Cash Receipts:	Fee	Expenses	Total
8/30/84	660.00		660.00
12/4	1,740.00		1,740.00
12/17	180.00	91.48	271.48
Totals	2,580.00	91.48	2,671.48

Cash Disbursements:	Name	Amount	Type
10/2/84	T. M. Levine	29.40	Entertain.
10/16	Allnet Communic.	2.01	Tele.
11/19	Allnet Communic.	16.48	Tele.
1/22/85	Amer. Express	31.00	Entertain
	Allnet Communic.	3.66	Telephone

Total 82.55

HELLENIC DEVELOPMENT

Cash Receipts:	Fee	Expenses	Total
10/10/84	1,500.00		1,500.00
11/13	3,000.00		3,000.00
12/10	3,000.00		3,000.00
1/14/85	3,000.00		3,000.00
			0.00
Totals	10,500.00	0	10,500.00

Cash Disbursements: Name		Amount	Type
10/4/84	E.T.Ellenis	40.75	Entertain.
10/10	A-1 Courier	26.40	Messenger
10/10	Economy Air Exp.	6.50	Messenger
10/22	Economy Air Expr.	11.00	Messenger
10/29	E.T. Ellenis	29.15	Entertain.
11/1	Amer. Express	67.29	Entertain.
11/8	Visual Aid Serv.	16.24	Photostats
11/19	Allnet Communic.	1.66	Tele.
	Economy Air Express	6.50	Messenger
12/3	E.T.Ellenis	49.80	Entertain.
12/4	Toronto Globe	2.15	Newspaper
12/5	Economy Express	25.95	Messenger
	Visual Aid Serv.	32.06	Stats
12/12	Hopkins Assoc.	24.36	Produc.
	Media Distrib.	212.39	Produc.
12/13	Allnet Communic.	14.75	Tele.
12/17	E. T. Ellenis	49.70	Entertain.
12/20	Economy Air Express	34.00	Messenger
1/7/85	E. T. Ellenis	39.05	Entertain.
1/22	Allnet Communic.	16.73	Telephone
	Economy Messenger	64.75	Messenger
1/24	E. T. Ellenis	40.90	Entertain

Total 197.33
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LUXEMBOURG

Cash Disbursements: Name		Amount	Type
1/2/85	T.M.Levine	28.50	Entertain.

NETH.ANTILLES

Cash Receipts:	Fee	Expenses	Total
9/10/84	3,750.00	124.84	3,874.84
9/13	750.00	1.99	751.99
10/15	1,500.00	287.25	1,787.25
Totals	6,000.00	414.08	6,414.08

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Cash Disbursements: Name	NA	Amount	Type
8/13/84	Allnet Communic.	0.25	Tel.
8/14	E.T.Ellenis	22.40	Entertain.
9/21	Allnet	2.12	Tel.

11/12

E. T. Ellenis

33.00 Entertain.

Total57.77
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NEWFOUNDLAND

Cash Receipts:	Fee	Expenses	Collection Charge	Total
8/7/84	5,416.66		-1,418.60	3,998.06
8/28	5,416.66		-1,407.24	4,009.42
10/9	5,416.66		-1,460.33	3,956.33
10/31	5,416.66		-1,451.66	3,965.00
12/10	5,416.66		-1,467.91	3,948.75
1/11/85	5,416.66		-1,471.16	3,945.50
				0.00
Totals	32,499.96	0	-8,676.90	23,823.06

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Cash Disbursements:	Name	NFD	Amount	Type
8/6/84	E.T.Ellenis		41.05	Entertain.
8/13	Allnet Communc.		21.90	Tel.
10/15/84	E.T.Ellenis		24.50	Entertain.
10/16	Allnet Communc.		3.37	Tele.
11/8	Visual Aid Serv.		11.91	Photostats
11/19	E. T. Ellenis		320.17	Tr & Enter
11/19	Allnet Communc.		7.08	Telephone
12/3	E.T.Ellenis		34.13	Entertain.
12/5	Copeland Cutler		357.00	Travel
12/13	Allnet Communc.		20.46	Tele.
1/3/85	Amer. Express		277.52	Travel
	Evening Telegram		74.92	Subscript.
1/22	Allnet Communc.		10.85	Tele.
	Cinn. Enquirer		1.00	Paper
	Wide World Photos		266.75	Photos
	Visual Aid Serv.		12.99	Stats
1/24	E. T. Ellenis		28.05	Entertain

Total1,472.61
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UNITED STATES DEPARTMENT OF JUSTICE
REGISTRATION UNIT
CRIMINAL DIVISION
WASHINGTON, D. C. 20530

NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form OBD-64 - Supplemental Statement):

Yes yes or No

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

Yes or No

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)


Signature

Feb. 27, 1985
Date

Ted M. Levine

Please type or print name of
signatory on the line above

President
Title

INTERNAL SECURITY
SECTION
REGISTRATION UNIT
RECEIVED
U.S. DEPARTMENT
OF JUSTICE
CRIMINAL DIVISION
MAR 5 3 07 PM '85